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May 7, 2020

BY EMAIL AND ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**RE: United States v. Mikal Leahr
20 Cr. 61 (RMB)**

Dear Judge Berman:

Application granted.
Conference adjourned to July 13, 2020 at 10:30 a.m.
Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.
SO ORDERED: Date: 5/8/2020
 Richard M. Berman, U.S.D.J.

I write on behalf of my client, Mikal Leahr, with the consent of the Government, to respectfully request a 60-day adjournment of the conference in the above-referenced case.

The disruption caused by the COVID-19 pandemic has hampered our ability to meet with Mr. Leahr, review discovery, and discuss his defense in this case. It has also hampered our ability to collect necessary records and discuss a disposition with the government. In consequence, we respectfully request that the Court adjourn the conference currently scheduled for May 11 for 60 days to allow counsel and Mr. Leahr adequate time to prepare and discuss the case with each other and the Government.

The Government requests that time from May 11 until the adjourn date be excluded from any Speedy Trial calculations. On behalf of Mr. Leahr, I consent to that request. A similar request for an adjournment and the exclusion of time has been made by all defendants in Mr. Leahr's case in front of Judge Stein, 19 Cr. 913 (SHS).

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/

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Cc: AUSA Kevin Sullivan